

IN THE UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF MISSISSIPPI

LARRY PALMER, MARY PALMER AND

PLAINTIFFS

VERSUS

HOPE ENTERPRISES

FKA ENTERPRISE CORPORATION OF THE DELTA

COMPLAINT TO SET ASIDE PURPORTED SUBSTITUTED TRUSTEE'S DEED

BEFORE THE COURT COMES NOW LARRY PALMER AND MARY PALMER and would say as follows, to wit:

1.

That the Plaintiffs are Larry and Mary Palmer, actual Adult Bona Fide Residents of Forrest County, State of Mississippi residing therein at 1200 Penton Street, Hattiesburg, Mississippi.

2.

That the Defendant is a Corporation existing pursuant to the laws and statutes of the United States of America and may be served with process by serving Hon. Charity Bridgewater, RCO LEGAL 2970 CLAIRMONT ROAD N.E. SUITE 780, ATLANTA, GA 30329.

3.

That heretofore on the 21st day of November, 2013, PRIORITY TRUSTEE SERVICE OF MISSISSIPPI, LLC attempted to and purportedly foreclosed on property owned by plaintiff, however, the publication was defective in that it was published for an in appropriate location. Specifically pursuant to a Resolution/Order of the Forrest County Board of Supervisors dated March 2, 1987, JUDICIAL, FORCLOSURE AND OTHER SALES WERE TO BE HELD AT THE "Northeast Main Door of the Paul B. Johnson Jr. Chancery Facility, which Chancery Facility is located at 641 Main Street, Hattiesburg in the City of Hattiesburg, , Mississippi,..." and were only to be held there until said functions could be relocated to the Forrest County, Courthouse.

4.

Instead the sale was published for "THE NORTHEAST REAR ENTRANCE OF THE PAUL BE JOHNSON CHANCERY BUILDING IN HATTIESBURG, MISSISSIPPI."

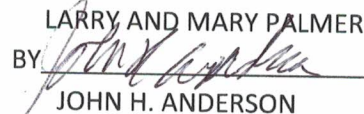
5.

Because of and be virtue of the fact that the sale was not published for the appropriate place, the attempted sale is invalid and void.

WHEREFORE PREMISES CONSIDERED, DEFENDANTS, COUNTER PLAINTIFFS, files this their Complaint and request the following, to wit:

- A. That the Complaint be received and filed.
- B. That a trial by Jury scheduled and had in this matter.
- C. That upon a full and final hearing hereof, The purported Substituted Trustee's Deed be set aside

RESPECTFULLY SUBMITTED, this the 21st day of August, 2016.

LARRY AND MARY PALMER
BY 
JOHN H. ANDERSON

JOHN H. ANDERSON

ATTORNEY AT LAW

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